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8 Attorneys for Plaintiffs
LOUIS VUITTON MALLETIER, S.A., AND
9 CHRISTIAN DIOR COUTURE, S.A.

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11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA
13 WESTERN DIVISION
14

15 LOUIS VUITTON MALLETIER,
16 S.A.; and CHRISTIAN DIOR
COUTURE, S.A.,

17 Plaintiffs,

18 v.

19 NEO INTERNATIONAL
20 CORPORATION, a California
corporation doing business as NEO
21 HANDBAGS; SIDONG A. PARK, aka
22 SI DONG PARK, an individual; and
JOHN DOES 1-10,

23 Defendants.
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Case No.: CV 10-01678-RGK (SSx)

**~~PROPOSED~~ JUDGMENT AGAINST
DEFENDANTS NEO
INTERNATIONAL CORPORATION
D/B/A NEO HANDBAGS AND
SIDONG A. PARK A/K/A SI DONG
PARK**

1 The Motion for Summary Judgment (hereinafter "Plaintiffs' Motion") as to
 2 Defendants Neo International Corporation, doing business as Neo Handbags and
 3 Sidong A. Park, also known as Si Dong Park ("Defendants") of Plaintiffs Louis
 4 Vuitton Malletier, S.A. and Christian Dior Couture, S.A. ("Plaintiffs"), was taken
 5 under submission by the Court on January 27, 2011.

6 On consideration of all of the evidence set forth in all of the pleadings, motion
 7 papers and other documents filed herein:

8 IT IS ORDERED AND ADJUDGED that the Motion be GRANTED.

9 The evidence establishes that Defendants distributed, advertised, offered for
 10 sale and sold unauthorized merchandise bearing counterfeits and infringements of
 11 Louis Vuitton's trademarks and Christian Dior's trademarks resulting in trademark
 12 counterfeiting, trademark infringement, false designation of origin, and federal and
 13 state unfair competition.

14 Specifically, Defendants sold goods bearing counterfeits of Plaintiffs' federally
 15 registered trademarks, specifically:

- 16 a. Handbags bearing Louis Vuitton Malletier, S.A.'s "Damier" design
 17 trademark (Reg. No. 2,421,618);
- 18 b. Wallets bearing Louis Vuitton Malletier, S.A.'s "Damier" design
 19 trademark (Reg. No. 3,576,404)
- 20 c. Handbags bearing Louis Vuitton Malletier, S.A.'s "Trunks & Bags
 21 Logo" design trademark (Reg. No. 3,531,297); and
- 22 d. Handbags bearing Christian Dior Couture, S.A.'s "Cannage"
 23 design trademark (Reg. No. 1,776,536).

24 Plaintiffs are therefore awarded

- 25 1. Statutory damages in favor of Plaintiff Louis Vuitton Malletier, S.A., in
 26 the amount of \$1,500,000.00; and
- 27 2. Statutory damages in favor of Plaintiff Christian Dior Couture, S.A., in
 28

1 the amount of \$500,000.00.

2 IT IS FURTHER ORDERED AND ADJUDGED that Defendants and their
3 agents, servants, employees, representatives, and all other persons, firms, or
4 corporations in active concert, privity, or participation with Defendants who receive
5 actual notice of this Judgment, are hereby immediately and permanently enjoined
6 throughout the world from:

- 7 (a) directly or indirectly infringing the Louis Vuitton and Christian
8 Dior Trademarks as described below, including generally, but not
9 limited to, manufacturing, importing, copying, distributing,
10 advertising, selling, and/or offering for sale any merchandise
11 which infringes Plaintiffs' trademark rights, and specifically
12 manufacturing, distributing, advertising, selling, and/or offering for
13 sale the products described in the pleadings and motion papers
14 filed in this case, namely women's handbags and wallets bearing
15 counterfeits and/or infringements of the Louis Vuitton or Christian
16 Dior Trademarks, or any other unauthorized products, which
17 picture, reproduce, or utilize the likenesses of or which copy or
18 bear a substantial similarity to any of the Louis Vuitton or
19 Christian Dior Trademarks;
- 20 (b) engaging in any conduct that tends to falsely represent that--or is
21 likely to confuse, mislead, or deceive purchasers, Defendants'
22 customers, and/or members of the public to believe that--the
23 actions of Defendants, the products sold by Defendants, or
24 Defendants themselves are connected with Louis Vuitton or
25 Christian Dior, are sponsored, approved, or licensed by Louis
26 Vuitton or Christian Dior, or is in some way connected or affiliated
27 with Louis Vuitton or Christian Dior;
- 28

- 1 (c) affixing, applying, annexing, or using in connection with the
 2 manufacture, distribution, advertising, sale, and/or offering for sale
 3 or other use of any goods or services, a false description or
 4 representation, including words or other symbols, tending to
 5 falsely describe or represent such goods as being those of Louis
 6 Vuitton or Christian Dior;
- 7 (d) diluting and infringing the Louis Vuitton or Christian Dior
 8 Trademarks and damaging Louis Vuitton's or Christian Dior's
 9 goodwill, reputation, and business;
- 10 (e) assisting, aiding or abetting any other person or entity from
 11 engaging in performing any of the above-described acts;
- 12 (f) effecting assignments or transfers, forming new entities or
 13 associations or utilizing any other device for the purpose of
 14 circumventing or otherwise avoiding the prohibitions set forth in
 15 subparagraphs (a)-(e) above.

16 The Louis Vuitton Trademarks are defined as the trademarks which are subject
 17 of the following trademark registrations (attached as Exhibit 1 hereto):

18 Mark	Registration No.	Registration Date
19 LV (and pattern design)	297,594	September 20, 1932
20 Damier	2,421,618	January 16, 2001
21 Damier	3,576,404	February 17, 2009
22 Flower Design	2,773,107	October 14, 2003
23 Trunks & Bags Logo	3,531,297	November 11, 2008

24
 25 and the trade dress of Louis Vuitton's XL handbag which consists of the design
 26 and ornamentation of Louis Vuitton's XL handbag, including without limitation the
 27 total image and overall appearance reflected in such features as the size, shape, color
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1 or color combinations, product design, texture, and selection and arrangement of
2 materials and accessories.

3 The Christian Dior Trademarks are defined as the trademarks which are subject
4 of the following trademark registrations (attached as Exhibit 2 hereto):

5 Mark	Registration No.	Registration Date
6 Cannage Design	1,776,536	June 15, 1993
7 Christian Dior	543,994	June 19, 1951

8 and the trademarks and trade names DIOR and CD.

9 This Judgment shall be deemed to have been served upon Defendants at the
10 time of its execution by the Court.

11 This Judgment shall be binding upon and inure to the benefit of the parties
12 heirs, successors and assigns.

13 The Court expressly determines that there is no just reason for delay in entering
14 this Judgment, and pursuant to Rule 54(b) of the Federal Rules of Civil Procedure, the
15 Court directs entry of judgment against Defendants.

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18 Dated: 04.08.11


HON. R. GARY KLAUSNER
UNITED STATES DISTRICT JUDGE

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21 Presented by:

22 KEATS McFARLAND & WILSON LLP

23
24 By : /s/
25 Anthony M. Keats
26 Attorneys for Plaintiffs
27 LOUIS VUITTON MALLETTIER, S.A., and
28 CHRISTIAN DIOR COUTURE, S.A.